

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MONADNOCK CONSTRUCTION, INC.,

Plaintiff,

Case No.: 16 CIV. 00420
ECF Case

-against-

WESTCHESTER FIRE INSURANCE
COMPANY,

Defendant.

**STIPULATED ORDER ON
PRODUCTION OF
UNREDACTED RECORDS**

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WESTCHESTER FIRE INSURANCE
COMPANY,

Third-Party Plaintiff,

-against-

GLASSWALL, LLC, UGO COLOMBO, and
SARA JAYNE KENNEDY COLOMBO

Third-Party Defendants.

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WHEREAS, third-party plaintiff Westchester Fire Insurance Company (“Westchester”), in response to document requests by third-party defendant Glasswall, LLC (“Glasswall”) has produced documents, including attorney time and payment records (“Records”), that were redacted due to attorney-client privilege, attorney work-product immunity or confidentiality;

WHEREAS, Glasswall made a letter request to the Court seeking an order that Westchester produce unredacted Records; and

WHEREAS, to resolve this dispute so as to preserve Westchester’s attorney-client privilege and attorney work-product immunity while allowing the production of unredacted

Records, Westchester, Glasswall and third-party defendants, Ugo Colombo and Sara Jayne Kennedy Colombo (collectively, “Colombos”) agree and stipulate as follows.

NOW THEREFORE IT IS STIPULATED AND ORDERED that;

1. Westchester shall produce the Records without the redactions for attorney-client privilege and work-product immunity (“Unredacted Records”);

2. Glasswall, the Colombos and Westchester agree that Glasswall’s production of the Unredacted Records shall not constitute a waiver of Westchester’s attorney-client privilege and/or attorney work-product immunity; and

3. If Glasswall, the Colombos and Westchester seek to use and file any Unredacted Records or any produced document marked Confidential, they shall seek to do so under seal in accordance with the Eastern District of New York’s Steps for E-Filing Sealed Documents in Civil Cases.

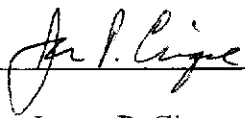
DATED: June 9, 2020

COZEN & O’CONNOR

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A handwritten signature in black ink, appearing to read "Joel Magolnick", written over a horizontal line.

By:_____

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*Attorneys for Ugo Colombo and
Sara Jayne Kennedy Colombo*

IT IS SO ORDERED

Date: June _____, 2020

Hon. Vera M. Scanlon
United States Magistrate Judge